

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Robert Dedmon, §
§
Plaintiff, § CIVIL ACTION NO. 4:21-cv-03371
§
vs. § Jury Demand
§
Shell Exploration & Production §
Company and Shell Trading §
Services Company, §
§
Defendants. §

**PLAINTIFF ROBERT DEDMON'S PROPOSED TOPICS AND
QUESTIONS FOR EXAMINATION OF PROSPECTIVE JURORS AS
PER SECTION 26 OF THE COURT'S PROCEDURES**

1. Generally, what are the expectations that employers have of employees?
2. Generally, what are the expectations that employees have of employers?
3. Who are discrimination laws designed to protect, all of us or just some?
4. Are laws against race discrimination important? Why?
5. Who here feels that government is overreaching or micromanaging with discrimination laws? That people are using our nation's laws to get special treatment?
6. Is discrimination worse, better, or about the same from 20 years ago?

7. Is discrimination in the workplace a significant concern in workplace today?
8. Are companies responsible for the actions of their managers?
9. Have you heard of at-will employment and how do you think it interacts with discrimination laws?
10. How do you feel about awarding mental anguish or emotional distress damages?
11. How do you feel about the responsibility of serving on a jury?
12. Who here has a friend or ever had a family member that has been accused of discriminating?
13. Who here has ever experienced or had a friend or family member experience unfair or illegal treatment on the job?

Respectfully submitted,

/s/ Amy Gibson

Ms. Amy E. Gibson
Attorney-in-Charge
Texas State Bar No. 00793801
Southern District Bar No. 20147
amy@gwfirm.com

Mr. David L. Wiley
Of Counsel
Texas State Bar No. 24029901
Southern District Bar No. 34134
david@gwfirm.com

Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923
T: (214) 522-2121
F: (214) 522-2126

and

Ms. Amanda C. Hernandez
Of Counsel
Texas State Bar No. 24064411
Southern District Bar No. 1531045
amanda@ahfirm.com

AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
T: (713) 588-4359
F: (281) 572-5370

Attorneys for Robert Dedmon